

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,
vs. **Case No.: 2:23-cr-20191-MSN**

**EMMITT MARTIN, III,
TADARRIUS BEAN, DEMETRIUS
HALEY, DESMOND MILLS, JR.,
AND JUSTIN SMITH**

Defendant.

MOTION FOR EXTRAORDINARY RELIEF

Come Now Defendant, Tadarrius Bean, by and through counsel, filing this *Motion to for Extraordinary Relief* and in support thereof would show this Court the following, to wit:

1. That on the 12th day of September 2023 Defendant Tadarrius Bean was indicted in the above referenced matter.
2. On September 13, 2023, Defendant Bean appeared before the Court and an Order Setting Conditions of Release (ECF No.: 18) was entered. Said Order required Defendant Bean to submit to GPS monitoring that required him to meet all conditions per the referenced Order.
3. That due to Defendant Bean complying with the Court's and Probation Service conditions and not posing any risk of flight or danger, Counsel for the Defendant is requesting that the previously given conditions are altered.
4. That if Defendant demonstrates full compliance with the modified conditions, including remaining within the designated district and adhering to his curfew, Defendant respectfully request that the Court eventually modifies the conditions of release by

removing GPS monitoring requirement while ensuring all other conditions remain in place.

5. That Bean's Probation Officer does not oppose the same.
6. Recently, the position of Defendant Justin Smith conditions was amended to reflect the same relief.

For the foregoing reasons, Defendant Bean hereby asks that this Court modify the conditions by removing the GPS monitor requirements.

Respectfully submitted,

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/s/ John Keith Perry, Jr.
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CERTIFICATE OF SERVICE

I, John Keith Perry, certify that I have filed a true and correct copy of the above and foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

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This the 21st day of February 2025.

/s/ John Keith Perry, Jr.
JOHN KEITH PERRY, JR.

